

## EXHIBIT G

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*Attorneys for Defendant/Counterclaimant* HYPHY MUSIC, INC.

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 YELLOWCAKE, INC., California  
12 corporation,

13 Plaintiff,

14 v.

15 HYPHY MUSIC, INC.,

16 Defendant.

**Case No.:**

**1:20-cv-00988-DAD-BAM**

**DEFENDANT/COUNTERCLAIMANT'S  
RESPONSES TO  
PLAINTIFF/COUNTERDEFENDANTS'  
FIRST SET OF REQUESTS FOR  
PRODUCTION**

17  
18 HYPHY MUSIC, INC.,

19 Counterclaimant,

20 v.

21  
22 YELLOWCAKE, INC.; COLONIZE  
23 MEDIA, INC; JOSE DAVID  
24 HERNANDEZ; and JESUS  
25 CHAVEZ SR,

26 Counterdefendants.

27  
28  
**DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO  
PLAINTIFFS/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR  
PRODUCTION**

1 PROPOUNDING PARTY: Plaintiff/Counterdefendants  
 2 YELLOWCAKE, INC., COLONIZE  
 3 MEDIA, INC., and JOSE DAVID  
 4 HERNANDEZ  
 5 RESPONDING PARTY: Defendant/Counterclaimant  
 6 HYPHY MUSIC, INC.  
 7 SET NUMBER: ONE (1)

8 Pursuant to Rule 34 of the Federal Rules of Civil Procedure (“FRCP”),  
 9 Defendant/Counterclaimant HYPHY MUSIC, INC. (“Responding Party”), hereby  
 10 responds to Plaintiff/Counterdefendants’ YELLOWCAKE, INC., COLONIZE  
 11 MEDIA, INC., and JOSE DAVID HERNANDEZ (collectively, “Requesting Party”)  
 12 First Set of Requests for Production.

13 **PRELIMINARY STATEMENT**

14 Responding Party makes these responses solely for the purpose of this action.  
 15 Responding Party has not fully completed its investigation of the facts relating to  
 16 this case, has not completed its discovery, and has not completed its preparation for  
 17 trial in this matter. Accordingly, all of the responses contained herein are based  
 18 solely upon information and documents that are presently available to and  
 19 specifically known to Responding Party. Further discovery and independent  
 20 investigation may supply additional facts and documents which may, in turn, clarify  
 21 and add meaning to known facts as well as establish entirely new matters, all of  
 22 which may lead to substantial additions to, changes in, and variations from the  
 23 responses set forth herein. The following responses are given without prejudice to  
 24 Responding Party’s right to produce evidence of any subsequently discovered fact(s)  
 25 or document(s) that later may be recalled. Accordingly, Responding Party reserves  
 26 the right to produce at trial all facts, opinions, or documents, the existence of which

1 are subsequently discovered through investigation, discovery, or otherwise, which  
2 support or tend to support its contentions at the time of trial.

3 Any information provided in response to the Requests is subject to any and all  
4 objections regarding competence, relevance, materiality, propriety and admissibility.  
5 Responding Party reserves these objections and any other objections not stated  
6 herein that would require the exclusion of any information, if such information is  
7 offered as evidence at any time during this action. Responding Party may interpose  
8 these objections at any time prior to and during the trial of this case. Further,  
9 attorneys' work product and/or privileged information are not referred to herein.  
10 Any disclosure of or reference herein to attorney-client privileged information or  
11 attorney work product is inadvertent and does not constitute a waiver such privilege.

12 No incidental or implied admissions are intended by these responses. The  
13 fact that Responding Party responds to or objects to a Request should not be taken  
14 as an admission that Responding Party accepts or admits the existence of any facts  
15 or legal conclusions assumed or presumed by the Request. The fact that Responding  
16 Party responds to part or all of a Request is not intended to be, and shall not be,  
17 construed as a waiver by Responding Party of any part of any objection to the  
18 Request.

19 **RESPONSES TO REQUESTS FOR PRODUCTION**

20 **REQUEST FOR PRODUCTION NO. 1:**

21 Produce all documents concerning or related to Defendants' exploitation of  
22 Yellowcake's Copyrighted Works including, but not limited to, such exploitation on  
23 digital distribution platforms such as YouTube, Amazon.com, and Spotify.  
24 Responsive documents shall include, but are not limited to, any: (i) royalty  
25 statements; (ii) contracts; (iii) reconciliations; (iv) payment receipts; (v) advertising  
26 copy; (vi) videos; (vii) "dashboard" information; and (viii) documents including, but  
27 not limited to, any royalty statements from any national or international performing



1 rights organization such as ASCAP, BMI, SESAC, PRS for Music, Sound Exchange  
2 or Mechanical Licensing Collective.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

4 Responding Party will comply with this Request and is producing all  
5 documents presently in Responding Party's possession, custody and/or control,  
6 identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing.  
7 As such, Responding Party reserves the right to supplement, amplify or amend its  
8 responses to this Request.

9 **REQUEST FOR PRODUCTION NO. 2:**

10 Produce all copies of any video, website, social media posting, or other  
11 document or file containing all or any part of any of Yellowcake's Copyrighted  
12 Works, and all metadata associated with such files.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

14 Responding Party will comply with this Request and is producing all  
15 documents presently in Responding Party's possession, custody and/or control,  
16 identified as: Responding Party will produce all files responsive hereto in their  
17 native format concurrently herewith. Additionally, discovery is ongoing. As such,  
18 Responding Party reserves the right to supplement, amplify or amend its responses  
19 to this Request.

20 **REQUEST FOR PRODUCTION NO. 3:**

21 Produce all documents (including but not limited to emails, letters, texts and  
22 other correspondence) by, between, or among Plaintiff and Defendant concerning or  
23 regarding any of Yellowcake's Copyrighted Works.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

25 After a diligent search, no such documents presently exist in Responding  
26 Party's possession, custody and/or control. Additionally, discovery is ongoing. As  
27

1 such, Responding Party reserves the right to supplement, amplify or amend its  
2 responses to this Request.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 Produce all internal documents (including but not limited to emails, letters,  
5 texts and other correspondence) by, between, or among Defendant concerning or  
6 regarding any of Yellowcake's Copyrighted Works.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

8 After a diligent search, no such documents presently exist in Responding  
9 Party's possession, custody and/or control. Additionally, discovery is ongoing.  
10 Additionally, discovery is ongoing. As such, Responding Party reserves the right to  
11 supplement, amplify or amend its responses to this Request.

12 **REQUEST FOR PRODUCTION NO. 5:**

13 Produce all documents (including but not limited to emails, letters, texts and  
14 other correspondence) by, between, or among Defendant and any third-party  
15 concerning or regarding any of Yellowcake's Copyrighted Works.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

17 After a diligent search, no such documents presently exist in Responding  
18 Party's possession, custody and/or control. Additionally, discovery is ongoing.  
19 Additionally, discovery is ongoing. As such, Responding Party reserves the right to  
20 supplement, amplify or amend its responses to this Request.

21 **REQUEST FOR PRODUCTION NO. 6:**

22 Produce all documents (including but not limited to emails, letters, texts and  
23 other correspondence) concerning, regarding, or relating to the exploitation by  
24 Defendant, or anyone acting on its behalf, of any of Yellowcake's Copyrighted  
25 Works.

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**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 7:**

Produce all documents sufficient to identify the name, and address, and job title of each employee, contractor, or agent of Defendant who had any role in designing, creating, programming, uploading, reviewing, and/or monitoring any video, website, social media posting, or other content containing all or any part of any of Yellowcake's Copyrighted Works.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000009-HYPHY000028. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 8:**

Produce all documents concerning, regarding, or relating to any investigation you have made concerning Defendant's exploitation of Yellowcake's Copyrighted Works.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 9:**

Produce all documents concerning, regarding, or relating to any actual or potential license you have ever obtained for the exploitation of any of Yellowcake's Copyrighted Works.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 10:**

Produce all contracts or other agreements, and any amendments thereto, by, between, or among Defendant and Plaintiff.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 11:**

Produce all contracts or other agreements, and any amendments thereto, by, between, or among Defendant and Colonize.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

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**REQUEST FOR PRODUCTION NO. 12:**

Produce all contracts or other agreements, and any amendments thereto, by, between, or among Defendant and any third-party that concerns any of Yellowcake's Copyrighted Works.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000009-HYPHY000024. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 13:**

Produce all documents, reflecting or concerning any revenue derived by Defendant arising from the exploitation of Yellowcake's Copyrighted Works, including, but not limited to, any royalty statements, spreadsheets, logs, ledgers, copies of checks and wire transfers.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 14:**

Produce all of the financial statements, profit and loss statements, net income statements, balance sheets, financial forecasts, projections, internal memoranda, ledgers, journals, bookkeeping entries, and business plans of Defendants from 2015 through the present.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

2 After a diligent search, no such documents that are not otherwise protected by  
3 Responding Party's rights of privacy or the attorney-client and/or attorney work  
4 product doctrine presently exist in Responding Party's possession, custody and/or  
5 control. Additionally, discovery is ongoing. As such, Responding Party reserves the  
6 right to supplement, amplify or amend its responses to this Request.

7 **REQUEST FOR PRODUCTION NO. 15:**

8 Produce all documents pertaining to your policies and procedures for  
9 addressing claims by licensors concerning the exploitation of intellectual property  
10 beyond the licensors' contractual authorizations.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

12 After a diligent search, no such documents presently exist in Responding  
13 Party's possession, custody and/or control. Additionally, discovery is ongoing. As  
14 such, Responding Party reserves the right to supplement, amplify or amend its  
15 responses to this Request.

16 **REQUEST FOR PRODUCTION NO. 16:**

17 Produce all documents (including but not limited to emails, letters, texts and  
18 other correspondence) concerning the creation of Los Originales Cover Art  
19 referenced in paragraph 18 of the Counterclaim.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

21 Responding Party will comply with this Request and is producing all  
22 documents presently in Responding Party's possession, custody and/or control,  
23 identified as: HYPHY000001-HYPHY000008, HYPHY000031-HYPHY000033,  
24 HYPHY000042-HYPHY000043, and HYPHY000045. Additionally, discovery is  
25 ongoing. As such, Responding Party reserves the right to supplement, amplify or  
26 amend its responses to this Request.

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**REQUEST FOR PRODUCTION NO. 17:**

Produce all documents (including but not limited to copyright registrations, copyright applications, contracts, work-for-hire agreements, employment agreements, emails, letters, texts and other correspondence) concerning Hyphy's alleged ownership of the Los Originales Cover Art referenced in paragraph 18 of the Counterclaim.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000001-HYPHY000008, HYPHY000031-HYPHY000033, HYPHY000042-HYPHY000043, and HYPHY000045. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 18:**

Produce all documents (including but not limited to emails, letters, texts and other correspondence) by, between, or among Defendant and any of the Yellowcake Parties concerning the Los Originales Cover Art referenced in paragraph 18 of the Counterclaim.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 19:**

Produce all documents (including but not limited to emails, letters, texts and other correspondence) by, between, or among Defendant and Jesus Chavez Sr.



1 concerning the Los Originales Cover Art referenced in paragraph 18 of the  
2 Counterclaim.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

4 After a diligent search, no such documents presently exist in Responding  
5 Party's possession, custody and/or control. Additionally, discovery is ongoing. As  
6 such, Responding Party reserves the right to supplement, amplify or amend its  
7 responses to this Request.

8 **REQUEST FOR PRODUCTION NO. 20:**

9 Produce all documents (including but not limited to emails, letters, texts and  
10 other correspondence) by, between, or among Defendant and Jesus Chavez Sr.  
11 concerning any of the Yellowcake Parties.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

13 After a diligent search, no such documents presently exist in Responding  
14 Party's possession, custody and/or control. Additionally, discovery is ongoing. As  
15 such, Responding Party reserves the right to supplement, amplify or amend its  
16 responses to this Request.

17 **REQUEST FOR PRODUCTION NO. 21:**

18 Produce all contracts or other agreements, and any amendments thereto, by,  
19 between, or among Defendant and Jesus Chavez Sr. concerning the Los Originales  
20 Cover Art referenced in paragraph 18 of the Counterclaim.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

22 After a diligent search, no such documents presently exist in Responding  
23 Party's possession, custody and/or control. Additionally, discovery is ongoing. As  
24 such, Responding Party reserves the right to supplement, amplify or amend its  
25 responses to this Request.

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**REQUEST FOR PRODUCTION NO. 22:**

Produce all contracts or other agreements, and any amendments thereto, by, between, or among Defendant and any third-party concerning the Los Originales Cover Art referenced in paragraph 18 of the Counterclaim.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 23:**

Produce all documents, including, but not limited to, all contracts or other agreements, and any amendments thereto, substantiating an alleged work for hire relationship between Defendant and Jesus Chaves Sr.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 24:**

Produce all documents, including, but not limited to, all contracts or other agreements, and any amendments thereto, concerning Jesus Chaves Sr.'s alleged employment with Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

After a diligent search, no such documents presently exist in Responding Party's possession, custody and/or control. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.



1 **REQUEST FOR PRODUCTION NO. 25:**

2 Produce all documents concerning Defendant's filing of copyright  
3 registrations in the Los Originales Albums referenced in paragraph 17 of the  
4 Counterclaim including, but not limited to any copyright registration certificates,  
5 copyright applications or supporting documents submitted to the U.S. Copyright  
6 Office.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

8 Responding Party will comply with this Request and is producing all  
9 documents presently in Responding Party's possession, custody and/or control,  
10 identified as: HYPHY000001-HYPHY000008. Additionally, discovery is ongoing.  
11 As such, Responding Party reserves the right to supplement, amplify or amend its  
12 responses to this Request.

13 **REQUEST FOR PRODUCTION NO. 26:**

14 Produce all documents that substantiate that Defendant is a co-author, co-  
15 owner, and/or joint owner of all copyrights in the Los Originales Albums referenced  
16 in paragraph 16 of the Counterclaim.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

18 Responding Party will comply with this Request and is producing all  
19 documents presently in Responding Party's possession, custody and/or control,  
20 identified as: HYPHY000009-HYPHY000024, HYPHY000029-HYPHY000030,  
21 HYPHY000034-HYPHY000041, HYPHY000044, and HYPHY000046-  
22 HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party  
23 reserves the right to supplement, amplify or amend its responses to this Request.

24 **REQUEST FOR PRODUCTION NO. 27:**

25 Produce all documents concerning Defendant's involvement in the recording  
26 of the Los Originales Albums referenced in paragraph 16 of the Counterclaim.

27 ///



**RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000009-HYPHY000024, HYPHY000029-HYPHY000030, HYPHY000034-HYPHY000041, HYPHY000044, and HYPHY000046-HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 28:**

Produce all documents that demonstrate that Defendant has allegedly not infringed Yellowcake's Copyrighted Works.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000009-HYPHY000024, HYPHY000029-HYPHY000030, HYPHY000034-HYPHY000041, HYPHY000044, and HYPHY000046-HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 29:**

Produce all documents that allegedly support Defendant's Counterclaim.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000001-HYPHY000008, HYPHY000031-HYPHY000033, HYPHY000042-HYPHY000043, and HYPHY000045. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

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**REQUEST FOR PRODUCTION NO. 30:**

Produce all documents referred to in Defendant's Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000001-HYPHY000158. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

**REQUEST FOR PRODUCTION NO. 31:**

Produce all documents Defendant intends to rely on in the defense of this action not already demanded herein.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

Responding Party will comply with this Request and is producing all documents presently in Responding Party's possession, custody and/or control, identified as: HYPHY000009-HYPHY000024, HYPHY000029-HYPHY000030, HYPHY000034-HYPHY000041, HYPHY000044, and HYPHY000046-HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party reserves the right to supplement, amplify or amend its responses to this Request.

DATED: March 31, 2022

ALTVIEW LAW GROUP, LLP

By:



JOHN M. BEGAKIS  
*Attorneys for Defendant/Counterclaimant*  
HYPHY MUSIC, INC.



VERIFICATION

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I have read the foregoing **DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR PRODUCTION** and know its contents.

\_\_\_\_ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.


X I am X an Officer \_\_\_\_ a partner of Hyphy Music Inc., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. \_\_\_\_ I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. X The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

\_\_\_\_ I am one of the attorneys for \_\_\_\_\_, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on March 29, 2022 at Fresno, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Jose Martinez  
Type or Print Name

  
Signature



**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 12100 Wilshire Blvd., Suite 800, Los Angeles, CA 90025.

On March 31, 2022, I served the documents described as:

**DEFENDANT/COUNTERCLAIMANTS' RESPONSES TO  
PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF  
INTERROGATORIES**

**DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO  
PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR  
PRODUCTION**

on all interested parties in this action by placing \_\_\_\_\_ the original X a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Thomas P. Griffin, Jr., Esq.  
HEFNER, STARK & MAROIS, LLP  
2150 River Plaza Drive, Suite 450  
Sacramento, CA 95833

Seth L. Berman, Esq.  
ABRAMS, FENSTERMAN, EISMAN LLP  
3 Dakota Drive, Suite 300  
Lake Success, NY 11042

[X]: BY MAIL:

As follows: I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepared at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X]: (STATE) - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 31, 2022, in Los Angeles, California.

  
John Begakis

PROOF OF SERVICE